

## RUSSO & TONER LLP

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September 21, 2020

The Honorable Mary Kay Vyskocil  
U.S. District Court - Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: **Stephen Feeley V. CIGNA, UNUM**  
Index No.: 20-cv-4366  
Our File No.: 819.217

Honorable Judge Vyskocil,

I represent the defendant, Life Insurance Company of North America incorrectly sued herein as CIGNA, in the above-referenced action. Plaintiff's Counsel and our office have agreed to a private Mediation with NAM Mediation Services which is currently scheduled for November 12, 2020 at 9am with Kenneth Grundstein, Esq. I am submitting this letter motion, with the consent of plaintiff's counsel, to request that the Initial Conference scheduled with the Court on October 22, 2020 be rescheduled until a date after the Mediation. We have never requested this specific relief before.

Thank you for your time and anticipated courtesies on this matter.

Respectfully submitted,

/s/ Kevin Horbatiuk  
Kevin G. Horbatiuk, Esq.

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**RUSSO & TONER**